

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**BBG COMMUNICATIONS, INC.**

§

§

**v.**

§

§

**NETWORK COMMUNICATIONS**

§

**INTERNATIONAL CORP.,**

§

**WILLIAM POPE;**

§

**JAY WALTERS and**

§

**JEFFERY WALTERS**

§

§

**v.**

§

**Civil Case No. 2:03-CV-227**

§

**RONALD PEREZ**

§

**RICARDO SINGER**

§

**(JUDGE WARD)**

**GREGORIO L. GALICOT**

§

**RAFAEL GALICOT**

§

**MICHAEL STOMPS**

§

**AWI FANG**

§

**a/k/a SURIYANTO SURIYANTO**

§

**GORAN ALEXIEV**

§

**MICHAEL ALEXIEV**

§

**PATRICK MAUCHANT**

§

**KEVEN WATT**

§

**BBG HOLDINGS BERMUDA d/b/a**

§

**BBG COMMUNICATIONS**

§

**(BERMUDA), LTD.**

§

**COUNTER DEFENDANTS BBG COMMUNICATIONS, INC.,**

**BBG HOLDINGS, LTD., AND THIRD-PARTY DEFENDANTS**

**RAFAEL GALICOT AND GREGORIO L. GALICOT'S DESIGNATION**

**OF TRIAL WITNESSES**

COUNTER DEFENDANTS BBG COMMUNICATIONS, INC. AND BBG HOLDINGS,  
LTD. AND THIRD-PARTY DEFENDANTS RAFAEL GALICOT AND GREGORIO L.  
GALICOT, make this Designation of Trial Witnesses, in accordance with the Court's Docket  
Control Order. COUNTER DEFENDANTS BBG COMMUNICATIONS, INC. AND BBG

HOLDINGS, LTD. AND THIRD-PARTY DEFENDANTS RAFAEL GALICOT AND GREGORIO L. GALICOT name the following individuals as potential trial witnesses, however, the parties have stipulated to an extension for discovery to November 24, 2004, and since discovery is still being conducted, other witnesses may be revealed, which these Counter Defendants and Third-Party Defendants reserve the right to supplement this list, and to include any such witnesses in its Joint PreTrial Order.

**Persons which Counter Defendants and Third-Party Defendants expect to call to testify at trial:**

1. Michael Stomps
2. Ronald Perez
3. Keven Watt
4. Rafael Galicot
5. Gregorio Galicot
6. Rosa Perez
7. Audrey Pek
8. Eric M. Albritton
9. Scott E. Stevens
10. Gregory P. Love
11. James Mittermiller
12. Betty J. Santohigaski
13. Norman Barr
14. William "Bill" Pope
15. Jay Walters
16. Joe Walters
17. Jeffrey Walters
18. Jeremy Walters
19. Joseph "Joey" Walters
20. Wesley Walters
21. Baron MacEntire
22. Luisa Cardenas
23. Maria Facio
24. Aline Harris
25. Rick LaGrone
26. Teresa Loeza
27. Chris Townsend
28. Jorge Macari
29. Xicotencatl Rivera

30. Ricardo Macari
31. Manuel Alvarez
32. Ricardo Singer
33. Angel Leon
34. Karen Bevans
35. Sharmin Saunders
36. Roger Seivright
37. Alain Ibanez
38. Damon Rhys
39. Brian Rhys
40. John Limitaco
41. Joe Sie Tsjo Tsjo
42. Chow Keng Hai
43. Salvador Lambrosa
44. Berlin Key
45. Charles Lightbourne
46. Craig Roberts
47. Nina Oquedo and custodian of records for Trans Ad
48. Sara Perez
49. Nancy Kelsey
50. Calvin Waltman
51. Ton Hoogstraaten
52. Maggie Perez
53. Marlene Moses
54. Frances Webb
55. Donna Sumrow
56. Nevill Prosper
57. Micah Roberts
58. Ruth Dewindt
59. Sunil Khatnani
60. Juan Porcel
61. Alfonso Riberol
62. Malic Penamatsa
63. Mark McFee
64. Sam Martin
65. Bryan Clark
66. Cheryl Phillips
67. Sharon Koh Siew Keng
68. John Bucknell
69. Randy Polk
70. Cynthia Soto
71. Steve Levine
72. Mercedes Herrera
73. Zuki Levanos

74. Ron Hutchinson
75. Jamie Maddox
76. Mike Thomas
77. Maggie Colebrook
78. Roberto Montoya
79. Edger Penegrina
80. Patrick Woodbridge
81. Bram Van de Star
82. Dirk Scholling
83. J. R. Salinas
84. William Lamoncia
85. Todd Darling
86. Rosibel Ramirez
87. Employees of British Telecom
88. Pedro Cordova
89. C.S. Chung
90. C.K. Haynes and Employees at Telem
91. Alfredo Clemesha
92. Gustavo Guillen
93. Jose Estrella and employees at Jose Communications
94. Jorge Garcia
95. Michael Vogel
96. Karen Dilday
97. Randy Dilday
98. Charles Green
99. Doris Troncoso
100. David Escobar
101. Goran Alexiev
102. Michel Alexiev
103. Michael Dubero
104. Agnes Yousef
105. Kevin Lewis
106. Cristina Chua
107. Robert Elsinga
108. Ralph Margo
109. Gustavo Guillen
110. Dennis Dlkedenic
111. Mario Castillo
112. Zellmer Kommunizion
113. Hank Drissen
114. David Lovell
115. Jose Parnas
116. Flavio Villa
117. Aldo Albino

118. Masimo Albino
119. Giura Longo
120. Vincent Cuomo
121. Fugencio Obiang
122. Jerome Sloiter
123. Patrick Mauchant
124. Jaime Mari
125. Alma Cristal
126. Rafael Sprowls

**Persons which Counter Defendants and Third-Party Defendants may call to testify at trial if the need arises:**

1. Julie Pope
2. Leslie Walters
3. Noemi Olmos
4. Roxie Romney
5. Mark Hood
6. Employees of NCIC
7. Employees of Network Comm. Int'l Corporation
8. Employees of BBG
9. Employees of BBG Holdings, Ltd.
10. Rafael Sprowls
11. Kathie Borosch
12. Jose R. Garcia Castro
13. Walter Margolies
14. Ruben Perez Perez
15. Saul Sasson
16. Datalie and Grigory Vidishev
17. Employees of Singapore Airport
18. Employees of El Salvador Airport
19. Employees of PayTel Guam
20. Employees of Swissotels
21. Employees of Telem St. Marrten
22. Employees of Starhub
23. Employees of Bluephones, Ltd.
24. Employees of Int'l Calling Services
25. Employees of Telemsa
26. Leo Bezemer
27. Employees of Puerto Rico Airport
28. Employees of Santiago Chile Int'l Airport
29. Employees of Telconet
30. Employees of Victoria Hotel
31. Employees of La Meridian Hotel

32. Employees of Melia Bali
33. Employees of Holiday Inn Bahamas
34. Employees of C&W Panama
35. Employees of Indosat
36. Linette Oguerdo
37. Employees of Telcom New Zealand
38. Employees of United Shipping Co., Ltd.
39. Kirk Skeete
40. Ed Squires
41. Keith Blizzard
42. Alfredo Ellmesha
43. Elizabeth Charles-Sooner
44. Deborah Barley
45. Rodney Bay
46. Mrs. Palsey
47. Employees of Marigot Beach Resort
48. Dennis Richardson
49. Mauricio Urrutia
50. Employees of Telcell St. Maaten
51. Employees of Cara Suites Le Pansee
52. Morne Fortune
53. Employees of Glen Castle Resort
54. Employees of Golden Arrow Inn
55. Michael Chastanet
56. S.A. Franciaco Ezcue
57. Airport of Manchester England
58. Felipe Lahrssen
59. Rodrigo Guzman
60. Paco

**These are the witnesses listed by NCIC that NCIC expects to call, and who may be called by Counter Defendant and Third-Party Defendants if the need arises:**

1. William Pope
2. Jay Walters
3. Jeff Walters
4. Javier Algorri
5. Goran Alexiev
6. Michel Alexiev
7. Delma Andrade - Clayton
8. Jamie Mari Angulo
9. Robert Bailes
10. Norman Barr

11. Jason Bolt
12. Luisa Cardenas
13. Awi Fang a/k/a Suriyanto Suriyanto
14. Gregorio L. Galicot
15. Rafael Galicot
16. David Greenberg
17. Jerry Gumpel
18. Jerry Haprer
19. Tom Henson
20. Tony Hoogstraaten, Jr.
21. Ron Hutchinson
22. Nancy Kelsey
23. Rick LaGrone
24. Steve Levine
25. Linda Martin
26. Ronald Perez
27. Cheryl Ann Phillips
28. Brian Rhys
29. Gary Shaver
30. Ricardo Singer
31. Sharon Small
32. Cinthia Soto
33. Michael Stomps
34. Flavio Villa
35. Mike Vogel
36. Mike Walters
37. Wesley Walters
38. Keven Watt

**These are the witnesses listed by NCIC that NCIC may if the need arises call, and who may be called by Counter Defendants and Third-Party Defendants if the need arises:**

1. Malcolm Adams
2. Manuel Alaniz
3. Martin Aldana
4. Sherrye Alexander
5. Aldo Albino
6. Rafael Alvear
7. Elsa Lara Amaya
8. Papa Andouille
9. Yuli Awan
10. Thomas Azevedo
11. Chris Maria Baumer

12. Jorge Benscome
13. Karen Berman
14. Karen Bevans
15. Brandon Bishop
16. Marcos Blaquier
17. Gary Bosse
18. Andy Boulogne
19. Michael Brown
20. John Bucknell
21. Francisco Bunt
22. Salvatore Bruno
23. Ettore Cardamellis
24. Andrea Maria Caruso
25. Clinton Charlery
26. Garfield Bertrand Charles
27. Norma Chen
28. Chow Keng Hia
29. Maggie Colebrook
30. Vincenzo Cuomo
31. Rubine Cunningham
32. Alfredo Clemesha
33. Delores Conway
34. Todd Darling
35. Randy Dilday
36. Shane Donovan
37. Michael Dubero
38. Ross Eicke
39. Christopher Elliott
40. Bob Ellis
41. Jonathan Epstein
42. David Escobar
43. Ricardo Esparza
44. Jose Estrella
45. Soula Evans
46. Maria Fazio
47. Jose Fernandez
48. Felix Finisterre
49. Peter Foster, Esq.
50. Desmond Fostin
51. Michael Frieds
52. Orly Galicot
53. Dominic Gatineau
54. George Geortitsis
55. Francisco Gomez-Palacio



56. Oliver Gonzales
57. Ricardo Gonzales
58. James Graham
59. Charles Green
60. Mayti Guerrero
61. Hugh Hagen
62. Andy Hamdi-Almasarweh
63. Bob Harper
64. Aline Harris
65. Mercedes Herrerra
66. Gonzalez Hervas
67. Colin Hill
68. Tony Hoogstraaten, Sr.
69. Alain Ibanez
70. Representatives of ICE
71. Moises Ismael
72. MJI Hotel
73. Castries, St. Lucia
74. Francisco Izcue
75. Stephanie Jackson
76. Vance James
77. Gus Jasangas
78. Edward Joseph
79. Berlin Key
80. Jeffrey Kinrich
81. Nancy Kite
82. Hubert Knulst
83. Filip Kriz
84. Tony Lacavera
85. William Lamonica
86. Barbara Lancaster
87. Elsa Lara
88. Jorge Lastra
89. Angel Leon
90. Peggy Lee
91. Zuki Levanos
92. Charles Lightbourne
93. John Limitaco
94. James Lin
95. Brian Lindquist
96. Teresa Loeza
97. David Lobo
98. Salvador Lombroso
99. Jorge Macari Lopez

100. Carlos Lorneli
101. Carlos Lomelia
102. Russ Lovell
103. David Linn
104. Peter Lorandos
105. Jorge Macari
106. Jose Lopez Macaria, Sr.
107. Jamie Maddox
108. Trevor Malanda
109. John Markakis
110. Tom Mayer
111. Rosalva Medina
112. Jose Nelson Mejia
113. Thomas Mello
114. Gregorio Michelson
115. Brian Mingo
116. Maureen Mitchells
117. Pilar Morales
118. Marlene Moses
119. Pamela Mosher
120. Guiselle Murillo
121. Cristina Navarro
122. Shirley Ney
123. Nicky Nixon
124. Trenequa Nixon
125. Fulgencio Obiang
126. Jose Oliva
127. Hesborne Ongadi
128. Cynthia Osuna
129. Ronald Parr / Paar
130. Mrs. Parsle and Bernice Justin
131. Rosa Perez
132. Alfred Phillips
133. Joann Pierce
134. Linda Platt
135. Iman Budi Pranoto
136. James Prospere
137. Katarina Radostova
138. Randy Reeves
139. Representatives, Retail Decisions
140. Enrique Reyna
141. Xicotencal Rivera
142. Cristina Rodriguez
143. Joann Romney

144. Damon Rhys
145. Craig Roberts
146. Cameron Rose
147. Mark Sain
148. Maria Salaisas
149. Freddie Salazar
150. Heike Schaackman
151. Douglas Scollin
152. Roger Sievright
153. David Shimeld
154. Jean Pierre Shoul
155. Douglas Singer
156. Jeroen Sluiter
157. Ander Soto
158. Mike Sre
159. Michael Stomps' brother
160. Andrew Swift
161. Maria Emilia Suazo
162. Gary Taylor
163. Bram Van de Star
164. Angel Vega
165. Mary Ann Vigier
166. Wayne Vitalis
167. Jeremy Walters
168. Joey Walters
169. Joseph Walters
170. Timothy Walters
171. Calvin Waltman
172. Patrick Waltrude
173. John & Rugh Wiggins
174. Tawyna R. Wojciechowski
175. Aileen Wong
176. Patrick Woodbridge
177. Lisa Wright
178. O'Donovan Yarde
179. Agnes Yousef
180. Jose Zuniga

**Custodian of Records will be called by written questions, and any such records as may have been secured by written question, or any other such business records will be made a part of the Joint Pre-Trial Order:**

1. Custodian of Records, TMC Worldwide

2. Custodian of Records, Dialmex
3. Custodian of Records, USATCOM1
4. Custodian of Records, Billing Concepts, Inc.
5. Custodian of Records, Tyler Better Business Bureau
6. Nina Oquedo and/or Custodian of Records, Trans Ad
7. Custodian of Records, AT&T
8. Custodian of Records, Centris
9. Custodian of Records, Global One
10. Custodian of Records, Heyman
11. Custodian of Records, HTI
12. Custodian of Records, International Calling Services
13. Custodian of Records, Network IP
14. Custodian of Records, Protel
15. Custodian of Records, San Diego Better Business Bureau
16. Custodian of Records, Telecom Services of Trinidad and Tobago
17. Custodian of Records, Teleglobe
18. Custodian of Records, VozBBG
19. Custodian of Records, VozPacifica

**Experts listed by NCIC and BBG that may be called:**

1. Delores Conway, PhD
2. Barbara Lancaster
3. James Graham
4. Robert Bailes, CPA
5. Mike Thomas
6. Jeffrey Kinrich

Individuals identified in records and documents produced in discovery and disclosure, employees and representatives of any of the parties, identified by other parties to this litigation, which are incorporated by reference.

COUNTER DEFENDANTS AND THIRD-PARTY DEFENDANTS further believe additional witness have, or may be, designated by the other parties hereafter. To the extent any such witness are designated, COUNTER DEFENDANTS AND THIRD-PARTY DEFENDANTS specifically reserve the right to supplement this designation with appropriate information as the same becomes available, and further reserves the right to call as a witness in this proceeding any of the following individuals who may have knowledge of relevant facts:

- (a) Any individual whose name is reflected in any document which has been or will be mentioned in any deposition;
- (b) Any individual whose name is reflected in any document which has been or will be exchanged or disclosed in the course of discovery;

- ©) Any individual whose name is reflected in any record provided through disclosures, discovery, answers to interrogatories, response to production, response to subpoenas, depositions on written questions;
- (d) Any individual identified in any other parties' Trial Witness and/or Expert Witness designations;
- (e) Any individual whose name is reflected in any document offered into evidence by any party in this case;
- (f) Any individual whose name is reflected in any document attached as an exhibit to any deposition taken or offered into evidence by any party in this case; and
- (g) Any individual as rebuttal and/or impeaching witnesses, the necessity of whose testimony cannot reasonably be anticipated before trial.

Respectfully submitted,

/s/ Gregory P. Love

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James J. Mittermiller  
California Bar No. 85177  
Sheppard, Mullin, Richter & Hampton, LLP  
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Facsimile: (619) 234-3815

ATTORNEYS FOR BBG  
COMMUNICATIONS, INC. AND BBG  
HOLDINGS, LTD. AND THIRD-PARTY  
DEFENDANTS RAFAEL GALICOT AND  
GREGORIO GALICOT

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon all parties or their counsel of record in accordance with the Federal Rules of Civil Procedure as amended on this the 5<sup>th</sup> day of November, 2004.

/s/ Gregory P. Love  
GREGORY P. LOVE